



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

GMP:AG  
F. #2009R01065

*271 Cadman Plaza East  
Brooklyn, New York 11201*

September 12, 2017

By Email

Eduardo Balarezo, Esq.  
400 Seventh Street, N.W.  
Suite 306  
Washington, DC 20004

Re: United States v. Joaquin Archivaldo Guzman Loera, et al.  
Criminal Docket No. 09-466 (S-4) (BMC)

Dear Mr. Balarezo:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby informs you that there have been seven productions of discovery in this case to date, specifically on February 14, 2017, March 08, 2017, April 10, 2017, April 24, 2017, May 05, 2017, July 12, 2017, and August 11, 2017. The government is attaching the letters regarding these productions detailing the discovery Bates-stamped numbered 0000001-00000030867.

The discovery produced to date includes material that is marked "Protected Material" and is subject to the terms of the Court's April 3, 2017 Protective Order (see Dkt. No. 57), and related orders. See Dkt. Nos. 51, 116, 129. The government is also producing draft transcripts pursuant to the September 12, 2017 signed stipulation between the parties.

Additionally, on July 21, 2017, the government made available certain material at its office, specifically, videos Bates-stamped number 0000008135-0000008142. The government subsequently provided these items to prior defense counsel upon the understanding that prior defense counsel would maintain custody of the recordings, and that the defendant would not be allowed to retain copies of these videos at the prison. They are being produced with the understanding that you will agree to the prior terms.

You can obtain these materials, and all future discovery, by contacting a third-party vendor at the contact information provided separately to you via email and referencing the above-captioned case and the passcode provided to you by the government. Only counsel

of record will be permitted to obtain these materials from the third party vendor. For all future productions, Defense Counsel will be provided two copies of discovery (one for Defense Counsel and one for the defendant).

Very truly yours,

BRIDGET M. ROHDE  
ACTING UNITED STATES ATTORNEY  
Eastern District of New York  
271 Cadman Plaza East  
Brooklyn, New York 11201

ARTHUR G. WYATT, CHIEF  
Narcotic and Dangerous Drug Section  
Criminal Division,  
U.S. Department of Justice

OF COUNSEL:

BENJAMIN J. GREENBERG  
ACTING UNITED STATES ATTORNEY  
Southern District of Florida

Enclosures

cc: Clerk of Court (BMC) (via ECF) (w/o encl.)